

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Case No. 19-24857-CMB
)	
Nakia Henderson)	Chapter 13
Debtor)	
)	Claim. No.: 11
Nakia Henderson)	
Movant)	
)	
v.)	
)	
Deutsche Bank National Trust Co., etal)	
Ronda J. Winnecour, Trustee)	
Respondent(s))	

DECLARATION

I, Albert G. Reese Jr., Esquire, attorney for the above-referenced Debtor, hereby submit this formal written Declaration that the existing Chapter 13 Plan is sufficient to fund the plan with the modified debt for the following reason:

Pursuant to Deutsche Bank National Trust Co., etal's Notice of Mortgage Payment Change dated November 11, 2024, the Debtor's current escrow payment for account number ending in **2591** is **\$117.05**. The new escrow payment is **\$99.18**. The new total mortgage payment is **\$515.60** effective November 1, 2024. The Debtor's Chapter 13 Plan is sufficient. The Debtor will pay the shortage directly to the Chapter 13 Trustee.

Dated: **November 12, 2024**

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Respectfully submitted by:
/s/ Nakia Henderson
Nakia Henderson

Respectfully submitted by:
/s/ Albert G. Reese, Jr., Esquire
Albert G. Reese, Jr., Esquire
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